

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

BITSELLER EXPERT LIMITED, and
ACCURACY CONSULTING LTD.,

Plaintiffs,

V.

VERISIGN INC., and
DOES 1-10,

Defendants.

Case No. 1:19-cv-1140 AJT/JFA

**CONSENT MOTION FOR EXTENSION OF TIME
TO RESPOND TO COMPLAINT**

Pursuant to Fed. R. Civ. P. 6(b)(1)(A), defendant VeriSign, Inc. (“Verisign”), by counsel, respectfully moves for an extension of time in which to respond to the complaint filed by the plaintiffs, Bitseller Expert Limited and Accuracy Consulting Ltd. (“Plaintiffs”), from October 10, 2019 to October 21, 2019. Good cause exists for the requested extension. Verisign requires additional time to investigate the matters alleged, which involve the actions of third parties, so it may adequately prepare its responsive pleadings. The requested extension is brief, will not significantly impact the progress of this case, and will not prejudice the Plaintiffs. Counsel for Verisign conferred with counsel for Plaintiffs, and counsel consented to the extension requested herein.

Dated: October 4, 2019

Respectfully submitted,

/s/ Timothy B. Hyland
Timothy B. Hyland
Virginia Bar No. 31163
Counsel for VeriSign
HYLAND LAW PLLC
1818 Library Street, Suite 500
Reston, VA 20190
Tel.: (703) 956-3566
Fax: (703) 935-0349
Email: thyland@hylandpllc.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 4th day of October, 2019, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing (NEF) to the following:

Jeffrey H. Geiger, Esquire
SANDS ANDERSON PC
1111 E. Main Street, Suite 2400
Bank of America Plaza
P.O. Box 1998
Richmond, VA 23218
jgeiger@sandsanderson.com

Valentin D. Gurvits, Esquire
Matthew Shayefar, Esquire
BOSTON LAW GROUP, PC
825 Beacon Street, Suite 20
Newton Centre, MA 02459
vgurvits@bostonlawgroup.com
matt@bostonlawgroup.com

/s/ Timothy B. Hyland
Timothy B. Hyland
Virginia Bar No. 31163
Counsel for VeriSign
HYLAND LAW PLLC
1818 Library Street, Suite 500
Reston, VA 20190
Tel.: (703) 956-3566
Fax: (703) 935-0349
Email: thyland@hylandpllc.com